

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

BILLY T. GREEN,

Plaintiff,

V.

**CHRISTUS SPOHN HEALTH SYSTEM
CORPORATION, d/b/a CHRISTUS
SPOHN HOSPITAL CORPUS CHRISTI**

Defendant.

CIVIL ACTION NO. 2:18-CV-00064

DECLARATION OF ERICA RANGEL CHAPA

STATE OF TEXAS

§

COUNTY OF NUECES

38

J. Erica Rangel Chapa, declare as follows:

1. "I am over 18 years of age, of sound mind, and am competent to testify about the matters set forth below. The facts stated herein are within my personal knowledge and are true and correct.

2. Billy T. Green (“Mr. Green”) worked as a pharmacy informaticist in the Health Informatics Department at CHRISTUS Spohn Hospital – Shoreline in Corpus Christi from June 2013 until his termination on December 16, 2016. A Pharmacy Informaticist is trained as a pharmacist, and assists with the operation and administration of computer information systems relating to pharmacy and medication management. I became Manager of Health Informatics for CHRISTUS Spohn in May 2015, making me Mr. Green’s immediate supervisor.

3. On June 17, 2016, I was contacted by my superior Leslie Stewart, System Director for Clinical Informatics, about an email Mr. Green had sent to the Health Informatics Department (with the exception of me, his immediate supervisor) complaining about system performance issues. *See Exh. A.1.* Ms. Stewart asked if Mr. Green had escalated the issue appropriately. I advised her that Mr. Green's concerns should have been raised in a different manner, and that I had already spoken to him about his delivery and audience. *See Exh. A.1.* This was an undocumented verbal corrective action.

4. In July 2016, Mr. Green sent a message via “LinkedIn” to the Chief Medical Information Officer (CMIO) of CHRISTUS Health, Dr. Luke Webster, making some operational recommendations. My immediate supervisor, Health Informatics Divisional Director Lillian Saucedo (“Ms. Saucedo”) told me she had been contacted by her superior, Glynda Crunk,

System Director of Health Informatics, about the message, and asked me to address Mr. Green's inappropriate LinkedIn communication to Dr. Webster with Mr. Green.

5. When I attempted to counsel Mr. Green about the LinkedIn message on July 14, 2016, I found he was not at work. Without my knowledge, Mr. Green was at home working that day. CHRISTUS's time and attendance policy prohibits working from home without prior approval from a manager. I sent Mr. Green a message through Skype asking why he was working at home without permission but he would not answer my question. *See* Exh. A.2. I then called him on the phone to discuss the issue and he hung up on me.

6. Pursuant to CHRISTUS's Progressive Discipline Policy, I issued Mr. Green a "documented verbal" Corrective Action for his LinkedIn communication with the CMIO, referencing his prior verbal coaching on June 17, 2016 for inappropriate communications that bypassed the chain of command. *See* Exhs. A.3 and A.4. He was coached to "[u]nderstand the audience when using email in addition to the content being shared." He was also advised that he could "report any concern at any time using the CHRISTUS Health Integrity Line" and was given the phone number for the Integrity Line. *See* Exh. A.4.

7. Also pursuant to CHRISTUS's Progressive Discipline Policy, I issued Mr. Green a "Written" Corrective Action for working from home without permission and hanging up on me when I tried to discuss the issue with him. *See* Exhs. A.3 and A.5. This Corrective Action referenced Green's "lack of respect towards management evidenced by him hanging up in mid conversation with his manager." He was also advised again that "working from home is not allowed except with permission from the manager ... in advance." This written Corrective Action was signed on July 18, 2016 by myself, Ms. Saucedo and Mr. Green. *See* Exh. A.5.

8. Around September 2016, I learned from Mr. Green that his teenaged son had been in a car accident. I later learned that his son was having some behavioral problems.

9. On September 27, 2016 I had a one-on-one meeting with Mr. Green as part of my routine "leader rounding" on associates. At that meeting, he told me he was having problems dealing with his 16 year old son. I reminded him the Employee Assistance Program was available and gave him information on the EAP. *See* Exhs. A.6 and A.7. Under "action items" for follow up, I noted the need to "increase/improve communication" and reiterated that Mr. Green could bring up issues or concerns at the weekly meeting or, for any personal issues he needed to address, he could discuss them with me in private. *See* Exh. A.6.

10. The next day, on September 28, 2016 I was informed by Pharmacy leadership that Mr. Green was behind on a project, and had failed to communicate how far behind he was until two days before the project was due. I was advised that Mr. Green reported to others on the project he only had "2-3 more [Dev IDs] to test," then he submitted his portion of the project with 123 corrections needing to be completed. I coached Mr. Green about his unacceptable failure to communicate, and reminded him that providing inaccurate information does not allow the manager or team to make necessary changes or accommodations to ensure CHRISTUS deadlines are met. *See* Exh. A.8.

11. On November 17, 2016 I received a call about Mr. Green from Mark Casanova, then President of CHRISTUS Spohn South. Mr. Casanova was concerned about an inappropriate email Mr. Green sent to an outside vendor, and asked that I look into it and address as appropriate. Mr. Casanova forwarded Green's inappropriate email, as well as an email from Estela Chapa, then Clinical Transformational Officer for CHRISTUS Spohn. *See* Exh. A.9. Estela Chapa also called and emailed me directly after she was contacted by the outside vendor about Green's email. Estela Chapa suggested a counseling and coaching session with Billy Green. *See* Exh. A.10.

12. That counseling session took place on November 18, 2016. Ms. Saucedo and I met with Mr. Green and reviewed with him a "FINAL" Corrective Action for his ongoing problem with inappropriate communications. *See* Exh. A.11. We also advised him that he would be put on a Performance Improvement Plan (PIP) to address his inappropriate communications and problems with email etiquette. This Final Corrective Action was signed by myself and Mr. Green, with a notation that Ms. Saucedo was also present via Skype. *See* Exh. A.11. The PIP referenced in the November 18, 2016 Final Corrective Action was put together after that meeting, then reviewed with Mr. Green on December 7, 2016. It was signed by both myself and Mr. Green. *See* Exh. A.12. The PIP described the performance improvement Mr. Green needed to accomplish in order to remain employed by CHRISTUS, and advised him that he would be terminated if his performance did not improve. *See* Exh. A.12.

13. To my knowledge, at no time while employed by CHRISTUS did Mr. Green give notice to CHRISTUS or its third-party leave administrator (Liberty Mutual, now Lincoln) that he would be taking FMLA leave related to his son's illness. At no time did I or, to my knowledge, anyone else at CHRISTUS, deny any request from Mr. Green to take time off work to care for his son. In November 2016, when Mr. Green's son was in the hospital in San Antonio, he and I agreed that he could work out of a CHRISTUS Santa Rosa facility in San Antonio. I coordinated with my counterpart at CHRISTUS Santa Rosa to arrange a place for him to work. However, Mr. Green never reported to the San Antonio work location we arranged for him.

14. Around December 1, 2016, I was present at a meeting during which Ms. Saucedo discussed with Mr. Green that FMLA leave may be available as a resource to him. Ms. Saucedo went over the CHRISTUS FMLA policy with Mr. Green, and gave him information on how to make an FMLA leave request. However, at no time was I told by Mr. Green or advised by others that Mr. Green was requesting to take FMLA leave due to any medical condition of his son. To my knowledge, he never initiated an FMLA leave request either before or after Ms. Saucedo discussed with him on December 1, 2016 the availability of FMLA leave as a resource, and the procedure for accessing that resource.

15. On December 5, 2016, I had another one-on-one meeting with Mr. Green as part of my regular "leader rounding" on associates. He told me that his son was doing well, and better than past weeks. *See* Exh. A.13, Mr. Green and I also discussed Paid Time Off (PTO) related to the upcoming holidays. There were 4 days over the December-January holidays that associates were required to take off work using their PTO. Mr. Green did not have enough accrued PTO to cover those mandatory days off. He and I agreed that I would allow him to work on two days that were otherwise mandatory PTO days. He did not ask to take additional, unpaid days off over the holidays to care for his son.

16. On December 14, 2016, while I was in Irving, Texas on business, I was contacted by associates on my team and told they were unable to contact Mr. Green, who was supposed to be available to assist with the Pyxis go-live (involving changes to the functionality of the Pyxis drug dispensing system at CHRISTUS Spohn facilities). In addition to his failure to communicate with the team about his whereabouts and how to reach him, Mr. Green had also failed to communicate to me or our Director, Ms. Saucedo, that the number of CHRISTUS Spohn facilities scheduled to “go live” had been reduced from six to one. He had not told me of any patient safety issues regarding the Pyxis go-live that would require this change.

17. When I reached out to discuss these concerns with Mr. Green on the morning of Thursday, December 15, 2016, I could not reach him at work. The system showed him being offline for 17 hours. I contacted Mr. Green via text at 11:37 a.m. and asked if he was at work, and his only reply was “Well, almost.” He did not tell me he was working onsite at any CHRISTUS facility as part of the go-live. He had not communicated to me or, to my knowledge, anyone else in management that he would be out of the office that morning, despite having been coached on the CHRISTUS attendance policy on multiple occasions.

18. On Friday, December 16, 2016 I tried again to discuss these concerns with Mr. Green and again found he was not at work. He did not tell me he was working onsite at any CHRISTUS facility as part of the go-live. I contacted him by email and Skype around 10:45 a.m. but he did not respond. I sent him a message that he needed to attend a coaching session with me and Ms. Saucedo (who would be present by Skype) at 2:30 p.m. that day, in the Health Informatics conference room at CHRISTUS Spohn Hospital – Shoreline. With the assistance of Ms. Saucedo and HR Business Partner Ivonne Garcia, I drafted a three-page coaching document discussing Mr. Green’s communication and attendance issues from December 14-16 to review with him at the meeting. *See Exh. A.14.*

19. Ms. Saucedo and I had no intention of terminating Mr. Green at that time; rather, we planned to continue the dialogue with him and continue trying to help him improve his ongoing attendance, performance and communication issues.

20. At the meeting, I found Mr. Green unreceptive to coaching. As the meeting began, Mr. Green acted very agitated, and I recall him saying “this is bullshit” and walking out of the room soon after the meeting started. He began yelling in the hallway and someone called security. Ms. Saucedo and I got HR on the phone, and HR instructed that I put Mr. Green on administrative leave while management and HR decided what action to take, and have him removed from the premises to diffuse the situation. I told Mr. Green he was being placed on administrative leave, took his computer and access badge, and had security escort him out of the hospital.

21. Following this incident, Mr. Green’s employment was terminated with the support and approval of CHRISTUS management, executive leadership and Human Resources. After the decision was made on the afternoon of December 16, 2016, I prepared a Corrective Action document reflecting the termination with input from Ms. Saucedo and Ms. Garcia. *See Exh. A.15.*

22. On Monday, December 19, 2016, while I was out of the office, three of my superiors (Glynda Crunk, Lilliana Saucedo and Luke Webster) and I were advised by Ms. Garcia that she had spoken with Mr. Green by phone that morning and told him he was terminated. Ms. Garcia further advised that Mr. Green was not in agreement with his separation and may be reaching out to a Health Informatics leader. *See* Exh. A.16.

23. The following day, December 20, 2016, when I returned to work, I formally terminated Mr. Green in the CHRISTUS system. *See* Exh. A.17. We sent Mr. Green his personal belongings by certified U.S. mail, which the USPS tracking shows he received on December 24, 2016. *See* Exh. A.18.

24. The next day, December 21, 2016, around 8:15 in the morning, I received a text from Mr. Green, showing a picture of a broken doorknob and telling me to “be careful.” *See* Exh. A.20. Later that day, I saw Mr. Green in the parking lot outside my window at CHRISTUS Spohn Hospital – Shoreline. I notified Ms. Garcia, who notified security and other management and HR personnel at the hospital. *See* Exh. A.21. We did not allow Mr. Green to enter the Health Informatics department. Mr. Green returned to the hospital again on December 27, 2016, and I understand he was issued a Criminal Trespass Warning by hospital security personnel.

25. Nothing about Mr. Green’s son’s car accident in September 2016 or his son’s subsequent behavioral problems played any role in Mr. Green’s termination. Mr. Green did not ever give notice that he was taking FMLA leave to care for his son, and no anticipated need for leave on the part of Mr. Green played any role in his termination.

26. The employment actions I took with regard to Mr. Green were motivated entirely by his work-related conduct, including poor attendance, poor communication, insubordination and disrespectful attitude toward me and other supervisors at CHRISTUS. This behavior is extensively documented from June 2016 through his termination on December 16, 2016. Mr. Green had been coached multiple times and given progressive corrective action for many months. He was given a Final Warning several weeks before his termination, and had been advised in writing that further misconduct would result in his termination. *See* Exhs. A.11 and A.12.

27. As Manager of Health Informatics for CHRISTUS Spohn and Mr. Green’s supervisor during the events made the basis of this lawsuit, I have personal knowledge of these events and I am a custodian of records with regard to the following materials attached to this Declaration in support of CHRISTUS Spohn’s Motion for Summary Judgment:

Exhibit A.1: June 17, 2016 Email from HI System Director Leslie Stewart to Chapa, forwarding Green’s department-wide email regarding “System Performance Issues”;

Exhibit A.2: Skype conversation between Erica Chapa and Billy Green on July 14, 2016;

Exhibit A.3: CHRISTUS Progressive Discipline Policy;

Exhibit A.4: Documented Verbal Corrective Action issued to Green on July 18, 2016 for inappropriate communications bypassing the chain of command;

Exhibit A.5: Written Corrective Action issued to Green on July 18, 2016 for working from home without permission and hanging up on his supervisor when she tried to coach him on this issue;

Exhibit A.6: Notes of Chapa's Leader Rounding meeting with Green on September 27, 2016, at which she noted "dealing with 16 yo son" and reminded him about the CHRISTUS Employee Assistance Program;

Exhibit A.7: CHRISTUS Employee Assistance Program information provided by Chapa to Green;

Exhibit A.8: Coaching document following September 28, 2016 report to Chapa by Pharmacy leadership that Green had failed to communicate how far behind he was on a project.

Exhibit A.9: Email from CHRISTUS Spohn President Mark Casanova to Erica Chapa regarding Green's inappropriate communications with an outside vendor [potentially sensitive business information redacted];

Exhibit A.10: Email from CHRISTUS Spohn Chief Transformational Officer Estela Chapa to Erica Chapa regarding Green's inappropriate communications with an outside vendor; asking that Green be counseled and coached [potentially sensitive business information redacted];

Exhibit A.11: November 18, 2016 FINAL corrective action issued to Green after Chapa got complaints CHRISTUS executive leadership about rude and unprofessional email Green sent to outside vendor; states Green to be placed on PIP.

Exhibit A.12: Performance Improvement Plan (PIP) put in place pursuant to November 18, 2016 Final Corrective Action.

Exhibit A.13: Notes of Chapa's Leader Rounding meeting with Green on December 5, 2016, stating his son is "doing well and much better than past weeks" and that she reviewed/discussed the attendance management policy with him;

Exhibit A.14: Three-page coaching document drafted by Chapa on December 16, 2016 to review with Green regarding his performance issues from December 14-16, 2016;

Exhibit A.15: Corrective Action form reflecting Green's termination following his outburst during a coaching meeting with Chapa and Saucedo on December 16, 2016;

Exhibit A.16: Email from Ivonne Garcia to Chapa and three of Chapa's superiors about her telephone notification to Plaintiff of his termination on December 19, 2016;

Exhibit A.17: CHRISTUS System Notification of Green's termination, entered December 20, 2016;

Exhibit A.18: Certified mail delivery receipt showing Green received his personal belongings following his termination, on December 24, 2016;

Exhibit A.19: COBRA notification letter sent to Green January 6, 2017 [personal identifying information redacted];

Exhibit A.20: Text sent by Green to Chapa on December 21, 2016 depicting a broken doorknob and telling her to "be careful";

Exhibit A.21: Email notification to CHRISTUS Spohn managers and security after Green showed up at the hospital on December 21, 2016.

The attached documents are true and correct copies of the originals, maintained in CHRISTUS's files. These documents were created, sent or received in the ordinary course of business of CHRISTUS at or near the time of the events depicted in the documents.

Signed under penalty of perjury this 1st day of April, 2019.


ERICA RANGEL CHAPA

Exhibit A.1

From: Chapa, Erica <erica.chapa@christushealth.org>
Sent: Friday, October 19, 2018 10:37 AM
To: Blair, Danya (Ptnr-Sat)
Subject: FW: System Performance Issues
Attachments: image001.png; image002.jpg

From: Chapa, Erica
Sent: Friday, June 17, 2016 5:06 PM
To: Stewart, Leslie; Saucedo, Lilliana; Crunk, Glynda
Subject: RE: System Performance Issues

Hello,

Yes, we were aware of the issue; however, Billy was working directly with IM to resolve the various issues which were appropriately escalated through the IM ROM.

As this was resolved, we didn't see a need to escalate through HI's leadership. There has not been an issue with IM's response. Feedback from the pharmacy staff is at times the Service Desk may not route the ticket to the appropriate associates at first depending on time of day (after hours) or depending on the service desk associate's incident management experience.

PHA staff were reaching out to Billy for assistance, Billy wanted to reiterate the importance of calling in INC tickets to the service desk and tried to coach them on the verbiage to utilize during the ticket submission.

Billy's idea of how to approve the service desk should have been brought up as a round table discussion on the PHA call. I have already spoken to him about his delivery and audience.

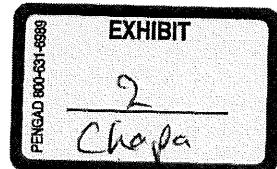
Thank you and have a Blessed day!

Erica Rangel Chapa, BSHS, RN
Manager-Spohn
Health Informatics, Division of Clinical Excellence
600 Elizabeth Street | Corpus Christi | TX 78404
O: 361. 881. 3089 | C: [REDACTED]



Health Informatics: Transforming care by analyzing, designing, and implementing clinical information systems and clinician workflows utilizing standardized clinical content, analytics, and appropriate clinical decision support to enhance outcomes and improve patient care across the continuum.

From: Stewart, Leslie
Sent: Friday, June 17, 2016 4:00 PM
To: Saucedo, Lilliana; Chapa, Erica; Crunk, Glynda
Subject: FW: System Performance Issues
Importance: High



Lilly/Erica,

Are you aware of the below communication being distributed? It is clear that there is significant frustration. Has there been an issue with response by IM? Were the issues escalated appropriately?

Thanks,

Leslie M. Stewart, PharmD

System Director, Clinical Informatics
Health Informatics, Division of Clinical Excellence
919 Hidden Ridge | Irving | TX 75038

CC: [REDACTED]



Health Informatics: Transforming care by analyzing, designing, and implementing clinical information systems and clinician workflows utilizing standardized clinical content, analytics, and appropriate clinical decision support to enhance outcomes and improve patient care across the continuum.

From: Green, Billy T.
Sent: Friday, June 17, 2016 3:49 PM
To: Stewart, Leslie; Skinner, Marvin; Thomas, Debra
Subject: FW: System Performance Issues
Importance: High

CC

From: Green, Billy T.
Sent: Friday, June 17, 2016 3:48 PM
To: Abebe, Daniel; Acosta, Ana L.; Adame, Noreen; Allen, Deborah D.; Anlagu, Stanley O.; Appling, Robert; Arispe, Alfredo; Asevedo, Melissa; Awudi, Elizabeth; Bacak, Amber M.; Barrera, Romeo; Bell, David; Benavides, Teofilo; Bray, David; Bray, Rachel; Burgos, Ofelia; Camacho, Helen; Carrizales, Aaron; Carrizales, Aaron (Old); Castellano, Staci; Castellanos, David; Cavazos Jr., Elias; Cervantes, Michelle; Constante, Luis; COTTON, ROBIN; Craft, Pamela A.; Cuellar, Natalie; Decock, Katie A.; DeJong, Sara G.; Delgado, Ricardo; Doyle, J; Doyle, Johnny; Dvorkin, Vladimir H.; Engelhaupt, Nicole M.; Eschbach, Bob; Espinoza, Jennifer; Estrada, Brenda; Frachiseur, Leigh; Fuentes, Raul; Gabriel, Guinxe; Garcia, Carlos; Garcia, Olivia; Garcia, Thelma; Garza, Diana; Garza, Rosa; Garza-Ybanez, Kathryn L.; George, Oladipo K.; Gomez, Concepcion; Griffin, Melvin; Guerrero, Irma; GUITARD, CHARLES; Gutierrez, James S.; Gutierrez, Sylvia; Guzman, Roxanne x.; Hellums, Derek K.; Hernandez, Amy; Hernandez, Mary; Holley, Claude S.; Horseman, Mike; Jimenez, Erika; Jimenez, Saul; Joseph, Diana E.; Kim, Jeong R.; Koffie-Larvei, Tete; Kubanik, Cecilia; Kuipers, Rachel; Lewis, Stacey; Llamas, Maria; Longoria, Alexzandra; Magallanez, Catherine A.; Mandel, Jeffrey; Mandel, Samuel; Marroquin, Mary; Martinez, Elizabeth; Martinez, Venessa; Mathews, Carolynn; Mazour, Jason; Mendoza, Brenda; Mercer, Karena; Messer, Anna; Miller, Teresa; Mitchell, Robert; Montalvo, Danny; Moore, Mary A.; Moore, Randy; Moreno, Richard; Moya, Gracie; Muckeroy, Telfia Y.; Munoz, Rene M.; Narlock, Kathy; Navarro, John A.; NGUYEN, MIKE; Nnadiotu, Ignatius C.; O'Deay, Shienna M.; Okokon, Christiana; Okonkwo, Ogechukwu; Olmeda, Marla; Olmeda, Monica M.; Olubode, Adeshola A.; Parker, Brian; Patrick, Tristan A.; Payne, Andrea; Pereida, Herlindo; Perez, Zhanita; Philbrick, Kristi; Prieto, Nicole M.; Puli, Surendra; Radam, Jason M.; Reyes, Virginia; Rivera, Ferman; Rivera, Selena; Rizzo, Cheryl; Robinson, Marilou; Rodriguez, Angelica R.; Rodriguez, Gina; Ruiz, Yvette; Ruiz, Yvonne; Salinas, Connie; Sample, Laura A.; Scavarelli, Anthony J.; Sepulveda, ERIK; Shodipo, Buelah; Silva, Noe; Sodipe, Morakinyo O.; Sorensen, Kayla M.; Sweet, Teresa; Tatulis, Rachel; Trevino, Karlye; Valadez, Joe; Valle-Garcia, Natalie; Varas, George; Vasquez, Melinda; Vu, Tony; Williams, David; Wilson, Laura; Winsjansen, Ester; Witcher, Linda J.; Wszolek, Douglas; Young, Welshuenn
Subject: System Performance Issues
Importance: High

Hello,

I'm sure you are all aware of the infrastructure problems / communication failures we have all experienced over the past week.

One thought on that—if your site has an issue that is adversely affecting patient care, delaying medication administration, or causing a patient safety concern, please CALL the help desk—13529.

Do not use the online self-service issue reporting system—it will not allow most users to create a “hot ticket.”

If your problem truly is urgent—think: DoseEdge failure, Orders failing to cross to PHA module, MT orders not crossing to Pyxis—tell the help desk to create a “Hot Ticket” for your incident.

Also, and I think this is important, TELL whoever you talk to up there that this issue is a PATIENT SAFETY CONCERN DIRECTLY AND ADVERSELY AFFECTING PATIENT CARE DELIVERY.

Make sure and tell them to type that into the ticket.

I think the real issue when these problems occur is not IM’s ability to correct them, but rather the way our incident tickets are handled by the service desk.

Thinking about it, perhaps we should re-think the way our tickets are prioritized. I suggested that we create a category within the ServiceNow site for issues causing patient safety concerns or adversely affecting patient care delivery.

That sounds pretty simple, but if we made a new category higher in priority than “Hot Ticket,” that would automatically be escalated to be immediately addressed, that might help a lot.

Billy T. Green, R.Ph.
Clinical Informatics Analyst - Pharmacy
Health Informatics, Division of Clinical Excellence
600 Elizabeth Street | Corpus Christi | TX 78404
O: 361. 881.3106 | C: [REDACTED]



Health Informatics: Transforming care by analyzing, designing, and implementing clinical information systems and clinician workflows utilizing standardized clinical content, analytics, and appropriate clinical decision support to enhance outcomes and improve patient care across the continuum.

CONFIDENTIALITY NOTICE: Confidential information, such as identifiable patient health information or business information, is subject to protection under state and federal law. If you are not the intended recipient of this message, you may not disclose, print, copy or disseminate this information. If you have received this in error, please reply and notify the sender (only) and delete the message. Unauthorized interception of this e-mail is a violation of federal criminal law.

Exhibit A.2

Green, Billy T.

Green, Billy T.

PHARMACIST INFORMATICS, Away 5 mins

2 Participants

Thursday, July 14, 2016

hello

can you please come by my office



at home

why are you at home



well, I got stuck at work

lol

was talking w Randy yesterday

don't understand your response



trying to get Skype to work

it needs VPN

I have you on PTO until Tuesday

Didn't you return to work yesterday?



right

hang on, let me look at it

in a sec



so, I had asked Randy about a new computer (faster) He said we'd cover it, if you ok'd it

well, looks like I don't need one now, since I built this one and it's lightning fast

Billy we need to talk, why you are working from home
as I wasn't aware of it



overworked since leaving for PTO

I will call u in a few.



anyway, back to first question

got it working before heading in, it just started working, so... here I am, continuing

billy

i just called ur cell phone

call me via skype

Last message received on 7/14/2016 at 11:02 AM

Exhibit A.3



PROGRESSIVE DISCIPLINE POLICY

Effective Date: January 5, 2015

Revision Date: N/A

Review Date: January 19, 2018

Approval: Debbie Arnold, Vice President, HR Operations

Policy Initiated by: HR Shared Services

Application: Enterprise

PURPOSE

The purpose of this policy is to clearly communicate expectations for Associate performance and conduct and to outline the process for discipline and corrective action.

POLICY

CHRISTUS Health believes that its success and ability to provide excellent patient care and customer service is largely dependent upon its Associates. Therefore, CHRISTUS Health is committed to maintaining a culture and work environment that reflects its Core Values and will strive to communicate expectations and provide feedback to Associates on an ongoing basis.

When, in CHRISTUS Health's sole discretion, an Associate's performance or conduct falls below CHRISTUS standards, CHRISTUS Health may take corrective action that it deems to be appropriate. Disciplinary actions may vary depending on, among other things, the severity of the offense, the circumstances under which the offense occurred, and the Associate's overall work record.

CHRISTUS Health uses a process of progressive discipline to give Associates an opportunity to correct work performance and conduct issues, while reserving the ability to immediately terminate employment in instances of serious harm or misconduct. With progressive discipline, each successive step in the process is more significant than the last. CHRISTUS Health also reserves the right to combine or skip steps depending upon facts of each situation. A single incident may be so severe as to warrant an immediate final warning or termination. Management will consult with Human Resources in making formal disciplinary or corrective action decisions.

CHRISTUS Health encourages the use of coaching as an ongoing interactive process to help Associates identify and overcome obstacles that hinder them from excelling at their jobs. Prior to progressing to formal corrective action steps, management is expected to communicate expectations and provide feedback to Associates in a coaching and mentoring fashion.

Formal Corrective Action Steps:

Step 1: Counseling - Step 1 creates an opportunity for management to bring attention to a performance or conduct issue. A counseling session will identify the performance or conduct issue and set forth the expectations for improvement or correction.

Step 2: Warning - Step 2 involves a more formal documentation of performance or conduct issues. If the conduct addressed by a counseling is repeated or additional problems occur within 12 months of a counseling, management may follow up with a written warning. A warning will typically identify the performance or conduct issue, set forth the expectations for improvement or correction, and warn of the next step of corrective action in the event the Associate fails to improve.

Step 3: Final Warning - If the performance or conduct addressed by the warning is repeated or additional problems occur within a 12-month period, discipline may progress to a final written warning. Termination may result if the Associate does not show immediate improvement. A final written warning requires prior consultation with Human Resources.

Step 4: Termination of Employment - The last and most serious step in the progressive discipline procedure is to terminate employment. Employment may be terminated based on progressive discipline within a 12-month period or based on the severity of a single incident. In certain circumstances, Associates may be terminated without prior notice or disciplinary action. An involuntary termination requires prior consultation with Human Resources.

Optional Corrective Action Steps:

There may be occasions when, based on the nature of the issue or the Associate's work history, a manager will consider other or additional options to manage conduct or performance. These options include:

Performance Improvement Plan (PIP) – A PIP is a written plan to clarify performance or behavioral expectations or provide a strategy to improve deficiencies. A PIP may be used with any step in the process. A PIP is intended as a corrective measure and is not necessarily disciplinary in nature unless it is in conjunction with a disciplinary action.

Suspension – Suspensions may be used when a performance, conduct or safety incident is so problematic that the most effective action may be the temporary removal of the Associate from the workplace. Management may recommend suspension as a disciplinary measure or to provide time for CHRISTUS to investigate an incident. Suspensions must be approved in advance by Human Resources. Suspensions may be with or without pay. Payment may also be determined based on results of the investigation. If the Associate is found to not be at fault, the time on suspension will be paid. If an Associate is found to be at fault, the suspension will be paid and appropriate disciplinary action will be taken. If the suspension is paid, regular hours should be entered in the time system to offset lost wages. If the Associate is found to be at fault and is discharged from employment, the suspension will not be paid.

Human Resources will provide guidance on payment to ensure protection of FLSA exemption status and compliance with wage and hour laws.

Administrative Leave – In exceptional circumstances, an Associate may be placed on administrative leave to allow time for the Associate or CHRISTUS Health to make a decision regarding work-related issues or

continued employment. Administrative leave must be approved in advance by Human Resources and may be with or without pay.

Referral to Employee Assistance Program (EAP) – In certain situations, an Associate may be referred to the EAP. Such referrals may be informal, formal, or mandatory. A referral to the EAP is intended as a corrective measure and is not disciplinary in nature. Whether or not an Associate participates in the EAP, his/her performance and conduct must meet CHRISTUS Health standards.

Major Offenses:

There are certain major offenses that may result in immediate termination. In other words, when an Associate commits a major offense, all or any part of CHRISTUS Health's progressive discipline process may be omitted, at CHRISTUS Health's discretion. Behavior that is illegal is not necessarily subject to progressive discipline and may be reported to local law enforcement. In order to avoid such severe consequences, Associates should follow simple common sense guidelines.

Major offenses include, but are not limited to:

1. Misusing the confidential or proprietary information of CHRISTUS or fellow Associates;
2. Inappropriate verbal or physical conduct with regard to race, color, religion, age, sex, national origin, disability, sexual orientation, or other characteristic protected by law;
3. Threatening, intimidating, coercing, or interfering with the performance of fellow Associates;
4. Fighting, pushing, throwing things, horseplay, or other disorderly conduct;
5. Any action compromising patient safety or care;
6. Falsifying applications, time sheets, personnel records, expense reports, or other documents;
7. Unauthorized or inappropriate access of patient records;
8. Unauthorized possession of firearms or other weapons on CHRISTUS premises;
9. Possession, sale, diversion or use of illegal or unauthorized prescription drugs;
10. Reporting for work under the influence of alcohol;
11. Job abandonment;
12. Sleeping on the job during work hours;
13. Insubordination (e.g., the willful refusal to comply with a reasonable instruction of management);
14. Abuse, misuse, destruction or defacement of CHRISTUS-owned property;
15. Unauthorized or inappropriate use of the organization's materials, time, equipment or property;
16. Working overtime without receiving prior authorization;
17. Engaging in acts of dishonesty, fraud, theft or sabotage;
18. Accepting gifts, money or other benefits in return for recommending or awarding a contract;
19. Making unauthorized commitments or expenditures on behalf of CHRISTUS;
20. Failing to comply with the CHRISTUS Code of Ethics or Conflict of Interest Policy;
21. Willfully mistreating fellow Associates or patients, including abusive or obscene language;

22. Violating CHRISTUS safety policies, causing hazardous or dangerous situations, or failing to report or remedy such situations;
23. Failing to cooperate in an internal investigation; and
24. Engaging in indecent or unlawful conduct on CHRISTUS premises.

Documentation:

Management should record *informal* corrective action as appropriate.

For *formal* corrective action, management will document the action taken in writing, setting forth the reasons for the particular corrective action, and provide a copy to the Associate and to the Associate's personnel file. (Management should use the Associate Documentation Form). Documentation should include the Associate's signature of acknowledgement. If the Associate refuses to sign the document, that refusal should be documented.

For *termination of employment*, all documentation will be placed in the Associate's personnel file. Generally, the Associate will not receive written documentation regarding the termination but will have the opportunity to discuss the termination.

Open Door Policy:

CHRISTUS Health is committed to working with its Associates to resolve any questions or concerns they might have with regard to CHRISTUS Health, including compensation, working conditions, policies, disciplinary action, procedures, or working relationships with co-workers and management. To fulfill this commitment, CHRISTUS Health has developed an Open Door Policy. Associates are encouraged to use the Open Door Policy to communicate openly with management or Human Resources to address and resolve any disagreements or issues regarding a corrective action.

At-Will Employment:

Nothing in this policy shall modify the at-will status of an Associate's employment. At all times, employment with CHRISTUS Health is considered to be at-will, and the employment relationship may be terminated by the company or Associate at any time for any lawful reason.

Exhibit A.4



Associate Corrective Action Form

Associate Name: Billy Green

Job Title: Pharmacy Informaticist

Department: Health Informatics

Location: CHRISTUS Health - Spohn Region

Date of Occurrence: July 14, 2016

Witness(es): Lilliana Saucedo and Glynda Crunk

The purpose of this Associate Corrective Action form is to provide you with written notice of serious areas of concern, gaps in your work performance, and to reiterate CHRISTUS Health's expectations for Associate conduct and job performance in the workplace.

PROGRESSIVE DISCIPLINE PHASE

Documented Verbal Written Final Termination (Term Code)

A Performance Improvement Plan (PIP) accompanies this Associate Corrective Action form

KEY BEHAVIORAL / PERFORMANCE CHALLENGES

Insubordination Deficiency in Key Competency/
Performance Area : _____

Failure to uphold
CHRISTUS Core Value(s): -

Attendance Integrity _____

Attitude Other: _____

APPLICABLE POLICIES/ PROTOCOLS

Open Door Policy

Violation/ Area(s) of Concern:

Violation: On July 8, 2016, Billy T Green sent Dr. Luke Webster, CMIO a Linked In message containing information of an email he sent his manager on July 6, 2016. Associate did not seek resolution of his concern with his direct manager (Erica Chapa), prior to escalating it within the organization to the System CMIO. The content of this email was also shared with HI Pharmacy Leadership and CHRISTUS leaders outside of HI.

Area(s) of Concern: bypassed the HI Divisional Director as well as the HI System Director

Corrective Action Historical Review – (i.e. Observations, Previous Discussions or Counseling):

Undocumented informal discussion about chain of command related to a previous incident of circumventing the chain of command on Friday, June 17, 2016.

Management Expectations Going Forward:

Once management is informed of Billy T Green's concerns, they will collect the relevant information and attempt to address his concerns. An Associate should seek resolutions through an immediate supervisor, first, before taking the matter further within the organization. If the nature of the concern is such that he does not feel comfortable talking to an immediate supervisor, he may skip that step of the process and move to the next level of management (Divisional Director).

If Billy Green still believes that his or her concerns have not been resolved, he may take his concerns to Human Resources. Human Resources will work with management to obtain all of the necessary facts and determine a resolution.

An Associate may report any concern at any time using the CHRISTUS Health Integrity Line at 1-888-728-8383.

Understand the audience when using email in addition to the content being shared

Associate Comments:

Signatures

Billy Green

Associate Name (Printed)

Billy Green

Associate Signature

7/18/16

Date

Form Reviewed by the following HR Partner: _____ Date: _____

Erica R Chapa
Manager Name (Printed)

ERChapa
Manager Signature

7/18/16
Date

Lillian Saucedo

Divisional Director,
Health Informatics

present via Skype
Meeting

Form Reviewed by the following HR Partner: _____ Date: _____

Exhibit A.5



Associate Corrective Action Form

Associate Name: Billy Green

Job Title: Pharmacy Informaticist

Department: Health Informatics

Location: CHRISTUS Health - Spohn Region

Date of Occurrence: July 14, 2016

Witness(es): Lilliana Saucedo and Glynda Crunk

The purpose of this Associate Corrective Action form is to provide you with written notice of serious areas of concern, gaps in your work performance, and to reiterate CHRISTUS Health's expectations for Associate conduct and job performance in the workplace.

PROGRESSIVE DISCIPLINE PHASE

Documented Verbal Written Final Termination _____
(Term Code)

A Performance Improvement Plan (PIP) accompanies this Associate Corrective Action form.

KEY BEHAVIORAL / PERFORMANCE CHALLENGES

Insubordination Deficiency in Key Competency/
Performance Area: _____

Attendance Failure to uphold
CHRISTUS Core Value(s): _____

X Attitude X Other: Unauthorized Absence; Working from Home without permission

APPLICABLE POLICIES/ PROTOCOLS

Time and Attendance System Policy

Attendance Management Policy

Violation/ Area(s) of Concern:

Violation: On July 14, 2016, I attempted to contact Billy T Green at work, only to discover that he was working from home (WAH). However, he had not requested permission in advance to work from home; thereby, violating the Time and Attendance System Policy.

Area(s) of Concern: Billy T Green made no reasonable effort to ask for permission to work from home in advance. Showing lack of respect towards management evidenced by hanging up in mid conversation with his manager.

Corrective Action Historical Review – (i.e, Observations, Previous Discussions or Counselling):

| |
|--|
| |
|--|

Management Expectations Going Forward:

From this department working from home is not allowed except with permission from the manager dependent on extreme situations.

Permission must be requested in advance and may or may not be approved at the manager's discretion.

Associate will display mutual respect toward management and all coworkers.

Reviewed with associate following policies:

Attendance Management Policy

Time and Attendance System Policy

Paid Time Off (PTO) Policy- System Office

Payment of Travel Time Policy

Associate Comments :

| |
|--|
| |
|--|

Signatures

Bill T Green
Associate Name (Printed)

Bill T Green
Associate Signature

7/18/16
Date

Erica Rangel Chapa
Manager Name (Printed)

Erica Rangel Chapa
Manager Signature

7/18/16
Date
Present via Skype
Meeting

Lillian Saucedo, Divisional Director, Health Informatics
Form Reviewed by the following HR Partner:

Date:

Form Reviewed by the following HR Partner: _____ Date: _____

Exhibit A.6



CHRISTUS
Health.

CHRISTUS Experience

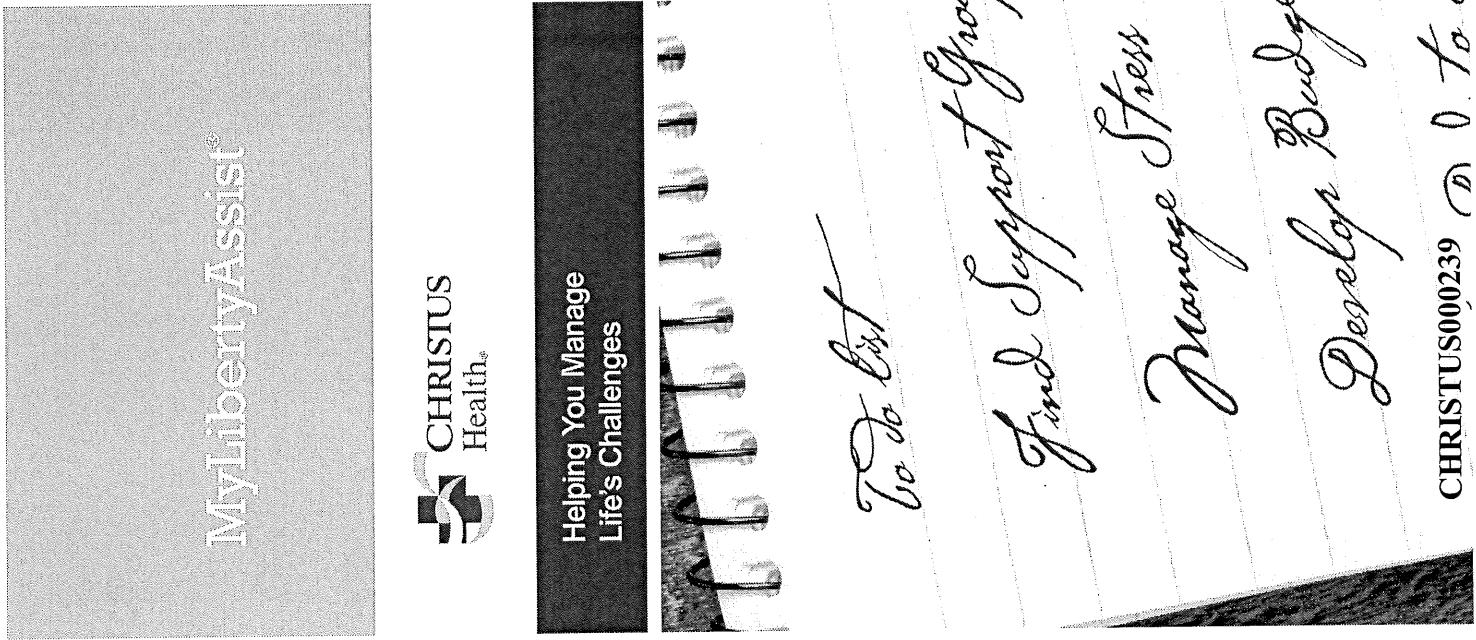
Leader Rounding on Associate Log

Leader Name ER Chapo

Department/Unit 21

| | | | |
|--|---|--|--|
| Associate Name & Date | <u>Billy Greer</u> | <u>9/27/16</u> | |
| Personal Connection: How are you? (Birthday, Family, Celebrations, Graduations, etc.) | dealing w/ a 16yr. son | Reminded him about the CHRISTUS Employee Assistance Program pamphlet. Reiterated that it is an option. | He mentioned that since that info is reported, it could be reflected. Reiterated |
| What's Working: What is working well for you? | Alaris Pump Contacted rep to help train PTA - focus to edit OS data more pertinent | Engine alerts are accurate and false alarms | |
| Systems, Tools, and Equipment: Are there any systems, tools, or equipment not working well for you? • Any ideas to fix them? Do you have the basic tools and equipment needed to do your job? | Not @ the time need a headset REQ for a computer | new processor Solid State Drive | |
| Process Improvement: What ideas do you have to improve processes, service, increase revenue or decrease costs? | Not @ the time | | |
| People to Recognize: Is there anyone I should recognize for doing great work? Who, What, Why | Gen | | |
| Anything I Can Do: Is there anything I can do for you right now? Thank you for making a difference! | Not @ time | | |
| Follow Up: Spotlight report and action items (if any) | increase/improve Communication between PI/Manager | reiterated that PTA issues or concerns should be brought up weekly @ IHT meeting to be discussed in manager w/ manager and team. | also communicated that PTA is not a personal issue can be discussed in manager meeting if deemed necessary |

Exhibit A.7



Helping You Manage Life's Challenges

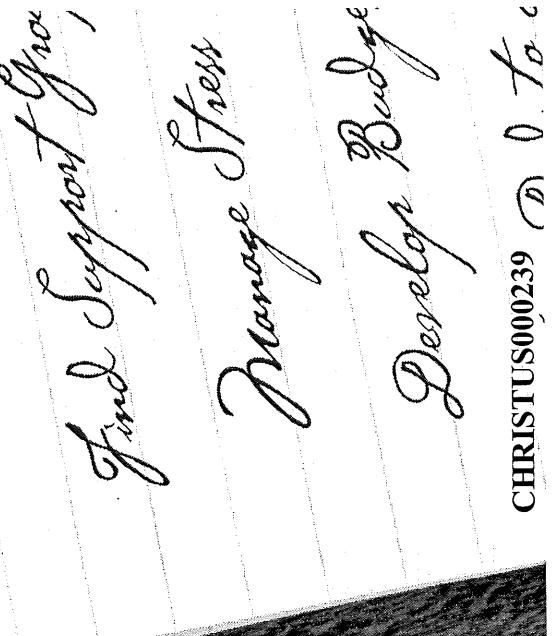
Every day you face decisions – managing stress, juggling deadlines and responsibilities, handling child or parental concerns, or developing a budget that works. Sometimes a 'to do' list can be overwhelming. You need to locate help for yourself or a family member – but do not know where to turn. MyLibertyAssist® services provide resources and assistance to help you manage life's challenges.

The Employee Assistance Program services ("Services") available under MyLibertyAssist® are provided by Bensinger, DuPont & Associates, Liberty Life Assurance Company of Boston does not insure or administer these services.

California residents seeking services are eligible to receive three (3) face-to-face sessions within a six-month time period.

Face-to-face sessions are available for individuals sixteen years and older.

Legal services do not include any action, proceeding or dispute between an employee and his employer, fellow employee, union, labor management trust fund, Employee Assistance Program (EAP) provider or group insurance carrier.



CHRISTUS000239 D 0. to c

MyLibertyAssist®

800-222-7277 or visit
www.bensingerdupont.com/maa
to access MyLibertyAssist® services.
The program is designed to provide assistance
with concerns including depression, marital or
family difficulties, addictions, legal and financial
problems, or childcare care.

Professional Masters degreed Employee
Assistance Program (EAP) counselors are
available to help 24 hours a day, seven days
a week. You may also contact a counselor
through your 3rd party convenience line.

Service Overview

Your EAP counselor will help you assess your concern and identify how to help. Depending on your concern, this may include:

- Meeting with an EAP counselor conveniently located near your home or work. You have up to five (5) face-to-face visits per issue for issues such as stress management, depression or marital conflict.
- Speaking with specialists for information and listings of childcare and elder care resources.
- Speaking with an attorney about your legal questions.
- Consulting with a financial counselor for debt management, savings, budgeting and credit counseling services.
- Locating community resources for self-help groups such as Alcoholics Anonymous or Gamblers Anonymous.
- Assessing specialized and/or long-term services within your health insurance benefits.
- Accessing online information and interactive tools.

Confidential Services

The information you discuss with your EAP counselor is kept confidential in accordance with federal and state laws.

Comprehensive Assistance

Help is available for:

- Depression
- Stress Management/Anxiety
- Marital or Family Conflict
- Relationship Problems
- Financial Concerns
- Legal Questions
- Addictions
- Child and Elder Care

MyLibertyAssist® – Helping You Manage Life's Challenges

MyLibertyAssist® services are provided at no cost through your company's insurance benefit plan. Caring professionals will help you identify resources, as well as provide information and assistance for life, work or family concerns.

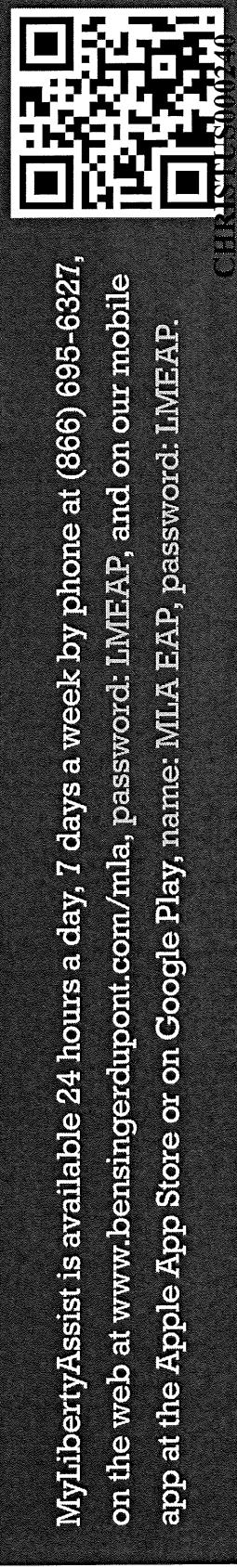


Exhibit A.8

Coaching Document

Performance Challenge: Failure to meet pre-determined deadline

Event/ Area(s) of Concern:

Event: On 9/28/16, I was informed by PHA leadership that Billy T Green was behind schedule on PHA Dev ID testing with two days left before the deadline. The PHA module lead told Billy to submit his portion of corrections to another Pharmacy Informaticist if he needed assistance. Billy submitted his portion of corrections to a Pharmacy Informaticist, on 9/28/16 which consisted of 123 PHA Dev ID corrections needing to be completed.

Area (s) of Concern: Billy T Green failed to communicate to manager that he was behind schedule with PHA Dev ID testing and would not meet deadline. Billy reported to HI team and manager on two occasions at the IHIT meeting he only had "2-3 more to test". Billy also reported to manager that he only had "1 more RXM Dev ID to test", on 9/29/16 which was not the case when spreadsheet was handed off to CI for completion. Manager would not have been aware of Spohn Team not completing/not meeting assigned testing deadline.

Management Expectations Going Forward:

In this department associates at times work independently for a common organization goal. It is critical to the success of this department and organization that information/updates are accurate when being delivered to manager/team. Accurate data allows for the manager/team to make necessary changes/accommodations to ensure CHRISTUS deadlines are met.

Exhibit A.9

From: Casanova, Mark <mark.casanova@christushealth.org>
Sent: Thursday, November 17, 2016 4:13 PM
To: Chapa, Erica
Cc: Chapa, Estela
Subject: Fwd: Checking In - CC South Alaris

Sensitivity: Confidential

Erica,
As discussed, here is Billy's correspondence to Joel Harding. I know you will look into it and address as appropriate. We do need to get the needed info to Joel asap. For South, Guinx stated that all info for the south NICU has been submitted to Billy. Please let me know if I can further assist.

Thanks. Mark

Begin forwarded message:

From: "Chapa, Estela" <estela.chapa@christushealth.org>
Date: November 17, 2016 at 1:59:15 PM CST
To: "Gabriel, Guinxe" <guinxe.gabriel@christushealth.org>
Cc: "Casanova, Mark" <mark.casanova@christushealth.org>
Subject: FW: Checking In - CC South Alaris

Guinex and Mark, I am a very concerned about the interactions and lack of progress to the work needed for the Data Set's to be completed. Delaying the transition is really not an option . I would recommend that you have a counseling and coaching session with Billy if he is not able to work effectively based on his home environment then he may need to make other arrangements or we may need to reassign this process to other members of our team.

Please reach our Joel Today....

Estela Chapa, FACHE, MSN, RN
Chief Clinical and Transformational Officer
CHRISTUS Spohn

Privileged and Confidential

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From: Joel.Harding@CareFusion.com [mailto:Joel.Harding@CareFusion.com]
Sent: Thursday, November 17, 2016 1:39 PM
To: Chapa, Estela

Cc: Joel.Harding@CareFusion.com

Subject: FW: Checking In - CC South Alaris

Estela,

Here is the latest string of communication between our Pharmacist, Lindsay Pelfrey, and Billy Green around the Alaris Data set and the changes that need to be incorporated for South to get them ready to use the Syringe modules. Please review this and let me know if you need anything further.

Thanks,

Joel

Joel Harding, BSN, RN

Senior Project Manager

(979) 418-2483

From: Green, Billy T. [<mailto:billy.green@christushealth.org>]

Sent: Thursday, November 17, 2016 1:14 PM

To: Harding, Joel; Pelfrey, Lindsay

Cc: Espinoza, Jennifer

Subject: RE: Checking In

I'll do what I can. I already told that woman we needed to push this project back. See, I am a single father with full time custody of my son. My nearest family is 1200 miles away, so it's not necessarily simple. I just got him home from a week in the hospital in San Antonio. So, in addition to the continual demands for production from your company, I have my usual responsibilities to catch up on.

At this point, I am still attempting to decipher what it is that this woman wants me to do.

Billy T. Green, R.Ph.

Pharmacy Informatics Analyst

Health Informatics

CHRISTUS Health

600 Elizabeth Street | Corpus Christi | TX 78404

(o) 361.881.3106 | (c) [REDACTED]

www.christushealth.org

From: Joel.Harding@CareFusion.com [<mailto:Joel.Harding@CareFusion.com>]

Sent: Thursday, November 17, 2016 1:07 PM

To: Lindsay.Pelfrey@Carefusion.com; Green, Billy T.

Cc: Espinoza, Jennifer; Joel.Harding@CareFusion.com

Subject: RE: Checking In

Billy,

Our team is scheduled to check in the new devices at South the week of 11/28. It is imperative that we have the Data Set changes completed and uploaded to the server prior to then. Lindsay needs the updated Data Set by tomorrow so she can perform a technical review and ensure that all of the changes actually function on the pump. If the final Data Set is not uploaded by 11/28, it may cause the project to be delayed.

Please let me know if you have any questions.

Thanks,

Joel

Joel Harding, BSN, RN

Senior Project Manager

(979) 418-2483

From: Pelfrey, Lindsay

Sent: Thursday, November 17, 2016 12:44 PM

To: Green, Billy T.

Cc: Espinoza, Jennifer (jennifer.espinoza@christushealth.org); Harding, Joel

Subject: RE: Checking In

We need to have the dataset changes [REDACTED]s, etc - see attachment from Jennifer) input into the Alaris GRE file and then I need you to send me the GRE file no later than tomorrow.

Lindsay Pelfrey, PharmD, BCPS

Sr Cnslt, Clinical Ops

Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin

US

t: 210.262.4104

bd.com

-----Original Message-----

From: Green, Billy T. [mailto:billy.green@christushealth.org]

Sent: Thursday, November 17, 2016 12:14 PM

To: Pelfrey, Lindsay

Subject: RE: Checking In

Sure. What do you need me to do?

Thank you,

Billy T. Green, R.Ph.

Clinical Informatics Analyst - Pharmacy

Christus Spohn Shoreline Hospital

Corpus Chrlsti, Texas 78404

Office: (361) 881-3106

Cell : [REDACTED]

billy.green@christushealth.org

-----Original Message-----

From: Lindsay.Pelfrey@Carefusion.com [mailto:Lindsay.Pelfrey@Carefusion.com]

Sent: Thursday, November 17, 2016 10:39 AM

To: Espinoza, Jennifer; Joel.Harding@CareFusion.com

Cc: Green, Billy T.

Subject: RE: Checking In

Hello Billy -

Checking in - any questions or concerns about getting the dataset complete by tomorrow?

Lindsay

Lindsay Pelfrey, PharmD, BCPS

Sr Cnslt, Clinical Ops

Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin

US

t: 210.262.4104

bd.com

-----Original Message-----

From: Pelfrey, Lindsay

Sent: Monday, November 14, 2016 9:51 AM

To: 'Espinoza, Jennifer'; Harding, Joel

Cc: Green, Billy T.

Subject: RE: Checking In

Just an update - Billy is planning on getting these changes input into the library and will have the file to me no later than this Friday.

I will run a technical review as soon as I get the file.

Lindsay Pelfrey, PharmD, BCPS

Sr Cnslt, Clinical Ops
Clinical Operations Mgmt
Lindsay.Pelfrey@BD.com
Texas - FIELD, Austin
US
t: 210.262.4104
bd.com

-----Original Message-----

From: Espinoza, Jennifer [mailto:jennifer.espinoza@christushealth.org]

Sent: Friday, November 11, 2016 3:57 PM

To: Pelfrey, Lindsay; Green, Billy T.

Cc: Harding, Joel

Subject: RE: Checking In

I've attached revisions of the [REDACTED]. I've left some areas highlighted as I need more input from nursing on [REDACTED] (11, 12, 13, etc.). Also, included some parameters for [REDACTED]. Curious to see how we'll need to tweak it.

Thank you,
Jennifer Espinoza
NICU Clinical Pharmacist
Christus Spohn Hospital - South
5950 Saratoga Blvd
Corpus Christi, TX 78414
(361)985-5559

-----Original Message-----

From: Lindsay.Pelfrey@Carefusion.com [mailto:Lindsay.Pelfrey@Carefusion.com]

Sent: Friday, November 11, 2016 9:22 AM

To: Espinoza, Jennifer; Green, Billy T.

Cc: Joel.Harding@CareFusion.com

Subject: RE: Checking In

Thanks Jennifer.
Lindsay Pelfrey, PharmD, BCPS
Sr Cnslt, Clinical Ops
Clinical Operations Mgmt
Lindsay.Pelfrey@BD.com
Texas - FIELD, Austin
US
t: 210.262.4104
bd.com

-----Original Message-----

From: Espinoza, Jennifer [mailto:jennifer.espinoza@christushealth.org]

Sent: Friday, November 11, 2016 8:28 AM

To: Pelfrey, Lindsay; Green, Billy T.

Subject: Re: Checking In

?It's coming along. We (nursing and myself) have been making some great progress. I plan to get the revisions to you before the end of the day.

Thank you,
Jennifer Espinoza
NICU Clinical Pharmacist
Christus Spohn Hospital - South
5950 Saratoga Blvd
Corpus Christi, TX 78414
(361)985-5559

From: Lindsay.Pelfrey@Carefusion.com <Lindsay.Pelfrey@Carefusion.com>

Sent: Thursday, November 10, 2016 4:04 PM

To: Green, Billy T.

Cc: Joel.Harding@CareFusion.com; Espinoza, Jennifer

Subject: Checking In

Billy -

Just checking since you were unable to attend at the meeting yesterday - we had great feedback and hopefully the nurses will be providing you additional suggestions as well.

Just a gentle reminder that I need the dataset turned into me by Monday afternoon so that I can perform a technical review so that you have time to make adjustments and have the file complete by Friday.

I sent an email outlining the notes from our call yesterday. Additionally, we've now learned that [REDACTED] I sent an email to the anesthesia contact to solicit feedback for you for what they may need added for [REDACTED]

Please let me know if you have any questions/concerns.

Lindsay

[cid:image001.jpg@01D23B6C.2AD2CADO]

Lindsay Pelfrey, PharmD, BCPS

Sr Cnslt, Clinical Ops

Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com<<mailto:Lindsay.Pelfrey@BD.com>>

Texas - FIELD, Austin

US

t: 210.262.4104

[bd.com](http://www.bd.com/)<<http://www.bd.com/>>

[cid:image002.jpg@01D23B6C.2AD2CADO]

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Exhibit A.10

From: Chapa, Estela <estela.chapa@christushealth.org>
Sent: Thursday, November 17, 2016 4:35 PM
To: Chapa, Erica
Subject: FW: Checking In - CC South Alaris

Importance: High
Sensitivity: Confidential

Erica please read the below thread of emails and give me a call...

Estela
[REDACTED]

From: Chapa, Estela
Sent: Thursday, November 17, 2016 1:59 PM
To: Gabriel, Guinx
Cc: Casanova, Mark
Subject: FW: Checking In - CC South Alaris
Importance: High
Sensitivity: Confidential

Guinex and Mark, I am a very concerned about the interactions and lack of progress to the work needed for the Data Set's' to be completed. Delaying the transition is really not an option . I would recommend that you have a counseling and coaching session with Billy if he is not able to work effectively based on his home environment then he may need to make other arrangements or we may need to reassign this process to other members of our team.

Please reach our Joel Today....

Estela Chapa, FACHE, MSN, RN
Chief Clinical and Transformational Officer
CHRISTUS Spohn

Privileged and Confidential

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From: Joel.Harding@CareFusion.com [mailto:Joel.Harding@CareFusion.com]
Sent: Thursday, November 17, 2016 1:39 PM
To: Chapa, Estela
Cc: Joel.Harding@CareFusion.com
Subject: FW: Checking In - CC South Alaris

Estela,

Here is the latest string of communication between our Pharmacist, Lindsay Pelfrey, and Billy Green around the Alaris Data set and the changes that need to be incorporated for South to get them ready to use the Syringe modules. Please review this and let me know if you need anything further.

Thanks,

Joel

Joel Harding, BSN, RN
Senior Project Manager
(979) 418-2483

From: Green, Billy T. [mailto:billy.green@christushealth.org]
Sent: Thursday, November 17, 2016 1:14 PM
To: Harding, Joel; Pelfrey, Lindsay
Cc: Espinoza, Jennifer
Subject: RE: Checking In

I'll do what I can. I already told that woman we needed to push this project back. See, I am a single father with full time custody of my son. My nearest family is 1200 miles away, so it's not necessarily simple. I just got him home from a week in the hospital in San Antonio. So, in addition to the continual demands for production from your company, I have my usual responsibilities to catch up on.

At this point, I am still attempting to decipher what it is that this woman wants me to do.

Billy T. Green, R.Ph.
Pharmacy Informatics Analyst
Health Informatics
CHRISTUS Health
600 Elizabeth Street | Corpus Christi | TX 78404
(o) 361.881.3106 | (c) [REDACTED]
www.christushealth.org

From: Joel.Harding@CareFusion.com [mailto:Joel.Harding@CareFusion.com]
Sent: Thursday, November 17, 2016 1:07 PM
To: Lindsay.Pelfrey@Carefusion.com; Green, Billy T.
Cc: Espinoza, Jennifer; Joel.Harding@CareFusion.com
Subject: RE: Checking In

Billy,

Our team is scheduled to check in the new devices at South the week of 11/28. It is imperative that we have the Data Set changes completed and uploaded to the server prior to then. Lindsay needs the updated Data Set by tomorrow so she can perform a technical review and ensure that all of the changes actually function on the pump. If the final Data Set is not uploaded by 11/28, it may cause the project to be delayed.

Please let me know if you have any questions.

Thanks,

Joel

Joel Harding, BSN, RN
Senior Project Manager
(979) 418-2483

From: Pelfrey, Lindsay
Sent: Thursday, November 17, 2016 12:44 PM
To: Green, Billy T.
Cc: Espinoza, Jennifer (jennifer.espinoza@christushealth.org); Harding, Joel
Subject: RE: Checking In

We need to have the dataset changes ([REDACTED], etc - see attachment from Jennifer) input into the Alaris GRE file and then I need you to send me the GRE file no later than tomorrow.

Lindsay Pelfrey, PharmD, BCPS
Sr Cnslt, Clinical Ops
Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin
US
t: 210.262.4104

bd.com

-----Original Message-----

From: Green, Billy T. [<mailto:billy.green@christushealth.org>]
Sent: Thursday, November 17, 2016 12:14 PM
To: Pelfrey, Lindsay
Subject: RE: Checking In

Sure. What do you need me to do?

Thank you,
Billy T. Green, R.Ph.
Clinical Informatics Analyst - Pharmacy
Christus Spohn Shoreline Hospital
Corpus Christi, Texas 78404

Office: (361) 881-3106
Cell : [REDACTED]
billy.green@christushealth.org

-----Original Message-----

From: Lindsay.Pelfrey@Carefusion.com [mailto:Lindsay.Pelfrey@Carefusion.com]
Sent: Thursday, November 17, 2016 10:39 AM
To: Espinoza, Jennifer; Joel.Harding@CareFusion.com
Cc: Green, Billy T.
Subject: RE: Checking In

Hello Billy -
Checking in - any questions or concerns about getting the dataset complete by tomorrow?

Lindsay

Lindsay Pelfrey, PharmD, BCPS
Sr Cnslt, Clinical Ops
Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin
US
t: 210.262.4104

bd.com

-----Original Message-----

From: Pelfrey, Lindsay
Sent: Monday, November 14, 2016 9:51 AM
To: 'Espinoza, Jennifer'; Harding, Joel
Cc: Green, Billy T.
Subject: RE: Checking In

Just an update - Billy is planning on getting these changes input into the library and will have the file to me no later than this Friday.

I will run a technical review as soon as I get the file.

Lindsay Pelfrey, PharmD, BCPS

Sr Cnslt, Clinical Ops
Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin
US
t: 210.262.4104

bd.com

-----Original Message-----

From: Espinoza, Jennifer [mailto:jennifer.espinoza@christushealth.org]
Sent: Friday, November 11, 2016 3:57 PM
To: Pelfrey, Lindsay; Green, Billy T.
Cc: Harding, Joel
Subject: RE: Checking In

I've attached revisions of the ~~NICU Standard~~. I've left some areas highlighted as I need more input from nursing on ~~the following, but ()~~ (~~the following, but ()~~). Also, included some parameters for ~~the following, but ()~~. Curious to see how we'll need to tweak it.

Thank you,

Jennifer Espinoza
NICU Clinical Pharmacist
Christus Spohn Hospital - South
5950 Saratoga Blvd
Corpus Christi, TX 78414
(361)985-5559

-----Original Message-----

From: Lindsay.Pelfrey@Carefusion.com [mailto:Lindsay.Pelfrey@Carefusion.com]
Sent: Friday, November 11, 2016 9:22 AM
To: Espinoza, Jennifer; Green, Billy T.
Cc: Joel.Harding@CareFusion.com
Subject: RE: Checking In

Thanks Jennifer,

Lindsay Pelfrey, PharmD, BCPS
Sr Cnslt, Clinical Ops
Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com

Texas - FIELD, Austin
US

t: 210.262.4104

bd.com

-----Original Message-----

From: Espinoza, Jennifer [mailto:jennifer.espinoza@christushealth.org]
Sent: Friday, November 11, 2016 8:28 AM
To: Pelfrey, Lindsay; Green, Billy T.
Subject: Re: Checking In

?It's coming along. We (nursing and myself) have been making some great progress. I plan to get the revisions to you before the end of the day.

Thank you,

Jennifer Espinoza

NICU Clinical Pharmacist

Christus Spohn Hospital - South

5950 Saratoga Blvd

Corpus Christi, TX 78414

(361)985-5559

From: Lindsay.Pelfrey@Carefusion.com <Lindsay.Pelfrey@Carefusion.com>

Sent: Thursday, November 10, 2016 4:04 PM

To: Green, Billy T.

Cc: Joel.Harding@CareFusion.com; Espinoza, Jennifer

Subject: Checking In

Billy -

Just checking since you were unable to attend at the meeting yesterday - we had great feedback and hopefully the nurses will be providing you additional suggestions as well.

Just a gentle reminder that I need the dataset turned into me by Monday afternoon so that I can perform a technical review so that you have time to make adjustments and have the file complete by Friday.

I sent an email outlining the notes from our call yesterday. Additionally, we've now learned that [REDACTED] [REDACTED] I sent an email to the anesthesia contact to solicit feedback for you for what they may need added for the syringe meds.

Please let me know if you have any questions/concerns.

Lindsay

[cid:image001.jpg@01D23B6C.2AD2CADO]

Lindsay Pelfrey, PharmD, BCPS
Sr Cnslt, Clinical Ops
Clinical Operations Mgmt

Lindsay.Pelfrey@BD.com<mailto:Lindsay.Pelfrey@BD.com>

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US
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[cid:image002.jpg@01D23B6C.2AD2CADO]

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Exhibit A.11



Associate Corrective Action Form

Associate Name: Billy Green

Job Title: Pharmacy Informaticist

Department: Health Informatics

Location: CHRISTUS Health_Spohn Region

Date of Occurrence: November 17, 2016

Witness(es): Mark Casanova and Estella Chapa

The purpose of this Associate Corrective Action form is to provide you with written notice of serious areas of concern, gaps in your work performance, and to reiterate CHRISTUS Health's expectations for Associate conduct and job performance in the workplace.

PROGRESSIVE DISCIPLINE PHASE

| | | | |
|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--------------------------|--------------------------|-------------------------------------|--------------------------|

A Performance Improvement Plan (PIP) accompanies this Associate Corrective Action form

KEY BEHAVIORAL / PERFORMANCE CHALLENGES

| | |
|--------------------------|---|
| <input type="checkbox"/> | Deficiency in Key Competency/ Performance Area : |
| Insubordination | <input type="checkbox"/> Failure to uphold CHRISTUS Core Value(s): - |
| Attendance | <input checked="" type="checkbox"/> <u>Integrity</u> |
| Attitude | <input type="checkbox"/> <u>Other: Email Etiquette</u> |

APPLICABLE POLICIES/ PROTOCOLS

Violation/ Area(s) of Concern:

Violation: Billy Green sent an email to outside vendors on November 17, 2016 which was less than respectful or professional as a representative of CHRISTUS Health. HI received communication from two Executives, a facility President and the Spohn Market Chief Clinical Officer, regarding the poor representation of CHRISTUS Health to an outside vendor and internal Spohn associate.

Area (s) of Concern: Email content lacking respect and professionalism.

Due to the inappropriate language and content, it reflects negatively on the organization and could drive away prospective customers or tarnish the organization's image. In addition, the recipient may consider that anything the associate says represents the company's views.

Corrective Action Historical Review – (i.e. Observations, Previous Discussions or Counseling):

Verbal Corrective Action done for Failure to uphold CHRISTUS Core Value (Integrity) on July 14, 2016. Management Expectations going forward included: Understand the audience when using email in addition to the content being shared.

Management Expectations Going Forward:

In this department associates at times work independently for a common organization goal and must show respect and professionalism to all involved entities, both internal and external of CHRISTUS. Billy Green must review audience, target group and terminology used in any communication sent via email prior to sending.

A Performance Improvement Plan (PIP) will be initiated to define the areas of concern and gaps in his work performance. This will allow the associate the opportunity to demonstrate improvement and commitment.

Associate Comments:

| |
|--|
| |
|--|

Signatures

Billy Green

Associate Name (Printed)



Associate Signature

11-18-16

Date

Erica Rangel Chapa

Manager Name (Printed)



Manager Signature

11-18-16

Date

present via
Skype
Meeting

Form Reviewed by the following HR Partner:

Lillian Saucedo
Divisional Director, Health Informatics

Page 2 of 3

Form Reviewed by the following HR Partner: _____ *Date:* _____

Exhibit A.12



PIP accompanied by an Associate Discipline Form

Performance Improvement Plan (PIP)

ENTERED

TO: Billy Green
FROM: Erica Rangel Chapa
DATE: 12/7/16

The purpose of this Performance Improvement Plan (PIP) is to define serious areas of concern, gaps in your work performance, reiterate CHRISTUS Health's expectations, and allow you the opportunity to demonstrate improvement and commitment.

Key Behavioral / Performance Challenges

| | | |
|-----------------|-------------------------------------|---|
| Insubordination | <input type="checkbox"/> | Deficiency in Key Competency/ Performance Area : _____ |
| Attendance | <input checked="" type="checkbox"/> | Failure to uphold CHRISTUS Core Value(s): - _____ |
| Attitude | <input checked="" type="checkbox"/> | Other: _____ Email Etiquette |

Areas of Concern:

Area (s) of Concern: Email content lacking respect and professionalism.

Due to the inappropriate language and content, it reflects negatively on the organization and could drive away prospective customers or tarnish the organization's image. In addition, the recipient may consider that anything the associate says represents the company's views.

Performance Improvement Plan or:

Observations, Previous Discussions or Counseling:

Verbal Corrective Action done for Failure to uphold CHRISTUS Core Value (Integrity) on July 14, 2016.
Management Expectations going forward Included: Understand the audience when using email in addition to the content being shared.

Step 1: Improvement Goals: These are the goals related to areas of concern to be improved and addressed:

1. Address your contact with the appropriate level of formality and courtesy
2. Use to the point, straightforward and concise language that encourages effective action
3. Information presented should be in a conversational tone instead of a confrontational one. Efficient business communication should be conducted in a professional not emotional tone.

Performance Improvement Plan or:

Step 2: Activity Goals: Listed below are activities that will help you reach each goal:

| Goal # | Activity | How to Accomplish | Start Date | Projected Completion Date |
|--------|---|--|------------|---------------------------|
| 1. | Learn the Do's & Do Not's of Business Email Etiquette | Review 3 Business Email Etiquette Articles | 12/7/16 | 1/7/16 |
| 2. | Utilize appropriate level of formality and courtesy to all recipients | Address recipient/audience with the highest level of courtesy and appropriate usage of language in all emails | 12/7/16 | 3/7/16 & On Going |
| 3. | Business emails should be limited to business related content | Review emails prior to submitting, to confirm email content is concise, clear and appropriate for audience. Associate can make adjustments to email when deemed necessary, ensuring emails contain only business related content | 12/7/16 | 3/7/16 & On Going |

Step 3: Management Support / Resources: Listed below are ways in which your manager will support your improvement activities as well as the resources which will be made available to you to complete your improvement activities (may include other people's time or expertise, funds for training materials and activities, or time away from usual responsibilities.)

1. Provide associate with an electronic and print out of the Use and Internet and Electronic Mail- CHRISTUS Health Policy to read/review
2. Provide associate with an electronic and print out of 101 E-mail Etiquette Tips by Judith Kallos
3. Manager will be readily available to provide guidance and/or assist with email development when deemed necessary.

Step 4: Expectations: The following performance standards must be accomplished to demonstrate progress towards achievement of each improvement goal:

1. Associate must complete his assignment of reviewing 3 Business Email Etiquette Articles and provide Reference Links.

Performance Improvement Plan on:

2. Associate must continuously utilize the appropriate level of formality, language use, and courtesy to all email recipients and audience.
3. Associate will review emails prior to submitting to confirm email content is concise, clear, and appropriate for audience. Associate can make adjustments to email when deemed necessary, ensuring emails contain only business related content.

Step 5: Progress Checkpoints: The following schedule will be used to evaluate your progress in meeting your improvement activities.

| Goal # | Activity | Checkpoint Date | Type of Follow-up (memo/call/meeting) | Progress Expected | Notes |
|--------|---|------------------------------|---------------------------------------|---|-------|
| 1 | Learn the Do's & Do Not's of Business Email Etiquette | 12/27/16 2/1/17 3/7/17 | meeting | Associate able to speak to and demonstrate the Do's of Business Etiquette clearly and professionally. | |
| 2 | Utilize appropriate level of formality and courtesy to all recipients | 12/27/16 2/1/17 3/7/17 | meeting | Manager will not receive notification of inappropriate emails from internal/external customers, associates, peers, etc. | |
| 3 | Business emails should be limited to business related content | 12/27/16 2/1/17 3/7/17 | meeting | Emails will be limited to business related matters only | |

Follow-up Updates: You will receive feedback on your progress according to the following schedule:

| Date Scheduled | Activity | Conducted By | Completion Date |
|----------------|-------------------------|--------------|-----------------|
| | - day Update Memo | | |
| | - day Update Memo | | |
| | - day Final Status Memo | | |

Timeline for Improvement, Consequences & Expectations:

Performance Improvement Plan or:

Effective immediately, you are placed on a 60 day PIP. During this time you will be expected to make regular progress on the plan outlined above. Failure to meet or exceed these expectations, or any display of gross misconduct will result in further disciplinary action, up to and including termination. In addition, if there is no significant improvement to indicate that the expectations and goals will be met within the timeline indicated in this PIP, your employment may be terminated prior to 60 days. Furthermore, failure to maintain performance expectations after the completion of the PIP may result in additional disciplinary action up to and including termination.

The PIP does not alter the employment-at-will relationship. Should you have questions or concerns regarding the content, you will be expected to follow up directly with me. We will meet again as noted above to discuss your Performance Improvement Plan. Please schedule accordingly.

Signatures:

Bill T. Green
Associate Name (Printed)

Bill T. Green
Associate Signature

12/7/2016
Date

Erica Rangel Chapa
Manager Name (Printed)

ERChapa
Manager Signature

12/7/16
Date

Exhibit A.13



CHRISTUS
Health

CHRISTUS Experience

Leader Rounding on Associate Log

Leader Name ERChapa

Department/Unit 21

| | | |
|--|---|--|
| Associate Name & Date | Billy Green 12/5/14 | |
| Personal Connection: How are you? (Birthday, Family, Celebrations, Graduations, etc.) | Son doing well, and better than past weeks | |
| What's Working: What is working well for you? | 3rd monitor & PC working well; working w/ Pharm D for drgs. | |
| Systems, Tools, and Equipment: Are there any systems, tools, or equipment not working well for you? Any ideas to fix them? Do you have the basic tools and equipment needed to do your job? | <u>New Chair</u> took chair from my office Once we get a new Chair - trying out 2nd office Chair | |
| Process Improvement: What ideas do you have to improve processes, service, increase revenue or decrease costs? | pxxs rejects - sending out communication to pxxs coordinators reiterating the importance of reviewing the pxxs rejects | |
| People to Recognize: Is there anyone I should recognize for doing great work? Who, What, Why | Racheal Tatulis identifying NT items/assistance | |
| Anything I Can Do: Is there anything I can do for you right now? Thank you for making a difference! | discuss Holiday PTO | |
| Follow Up: Stoplight report and action items (if any) | Discussed/Reviewed Attendance Management Policy w/ regards to notifying manager when leaving early (Unauthorized Early Departure) Director went over policy during IT/IT Meeting. | |

Exhibit A.14

Coaching Document

Performance Challenge: Failure to meet pre-determined go live initiative

Event/ Area(s) of Concern:

Event: On 12/14/16, ED Pyxis machine's for all 6 facilities within the Spohn Market were scheduled to go live with these Pyxis machines becoming profiled.

Area (s) of Concern: Billy T Green failed to communicate to manager, Health Informatics Team, and Spohn Market when the Pyxis machines were switched to profile and that only one facility (SST) went live vs. all 6 facilities.

Management Expectations Going Forward:

In this department associates at times work independently for a common organization goal. It is critical to the success of this department and organization that information/updates are accurate when being delivered to manager/team. Accurate data allows for the manager/team to make necessary changes/accommodations to ensure CHRISTUS deadlines are met. The Health Informatics Team was portrayed within this go live with having poor communication to the market and very unorganized. The other portion is that other Health Informatics team members had to take on additional roles to communicate and assist the Spohn market facilities with this initiative while a lead associate was not available/not responding to assist the market.

Coaching Document

Performance Challenge: Failure to notify manager/associate in charge of tardiness

Event/ Area(s) of Concern:

Event: On 12/15/16, I was currently in Irving at a HI managers' meeting, I was attempting to communicate with Billy Green via Skype and he was showing offline for 17 hrs. I texted Billy Green @1137 asking if he was at work. He responded with Well, almost...

Area (s) of Concern: Billy T Green failed to communicate to manager/associate in charge that he would be tardy. He texted the manager and person in charge on Monday- Wednesday that he was running late; however he failed to communicate on Thursday.

Management Expectations Going Forward:

In this department associates need to follow the Attendance Management Policy which has been reviewed with team recently in September 2016 and December 2016. The policy was personally reviewed with this associate in July 2016 and on another day in December 2016.

Coaching Document

Performance Challenge: Failure to notify manager of tardiness

Event/ Area(s) of Concern:

Event: On 12/16/16, I was attempting to communicate with Billy Green about his unauthorized tardy occurrence when I noticed he was not at his desk or online via Skype. I sent him an email and text at 1045 asking if he was planning to come into work today. He didn't respond to email or text message.

Area (s) of Concern: Billy T Green failed to communicate to manager that he would be tardy. He texted the manager and person in charge on Monday- Wednesday that he was running late; however, he failed to communicate on Thursday and Friday.

Management Expectations Going Forward:

In this department associates need to follow the Attendance Management Policy which has been reviewed with team recently in September 2016 and December 2016. The policy was personally reviewed with this associate in July 2016 and on another day in December 2016.